

## **Exhibit EAS-12**

Sierra Club Request 4-4

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2020-125-E**

In re:

Application of Dominion Energy South  
Carolina, Incorporated for Adjustment  
of Rates and Charges (See Commission  
Order No.2020-313)

**SIERRA CLUB’S FOURTH SET  
OF DATA REQUESTS  
October 22, 2020**

Pursuant to R.103-833 of the South Carolina Code of Regulations, Intervenor Sierra Club, by and through undersigned counsel, serves the following data requests on Dominion Energy South Carolina, Inc. (“Dominion” or the “Company”) in the above referenced docket. These requests are continuing in nature to the extent permitted by the rules of the South Carolina Public Service Commission and the South Carolina Rules of Civil Procedure.

**INSTRUCTIONS**

1. These requests should be regarded as continuing. If, after filing its initial response to the interrogatories and requests, the Company becomes aware of any information that would alter or amend any responses, please provide updated responses as additional information becomes available.
2. If a response to any of the attached requests requires any calculations, analyses, assumptions, or studies, please identify and provide copies of such calculations, analyses, assumptions, or studies—including all work papers relating thereto. For any analyses or calculations prepared

using electronic workbooks, please provide operational versions of those spreadsheets as well as all operational versions of all supporting workbooks used to develop inputs.

3. Produced documents should include originals and all other copies which are not absolutely identical as well as all drafts and notes (whether typed, handwritten or otherwise) made or prepared in connection with such documents, whether used or not.
4. With respect to requests for analyses or calculations that were prepared using electronic workbooks, please provide operational versions of those spreadsheets (i.e., with calculations active) as well as all operational versions of all supporting workbooks used to develop inputs.
5. Unless otherwise specified, all requests for documents herein pertain to the Company's South Carolina operations. Please ensure that all responses are specific to the Company's South Carolina service territory. Where South Carolina-specific data are not available, please provide an appropriate factor, method or percentage to allow for an accurate estimate of South Carolina-specific data to be performed.
6. If you consider any document to be privileged or protected from production, then you must:
  - (i) include in your response a list of documents withheld from production, (ii) identify each document by date, addressee, author, title and subject matter, (iii) identify those persons who have seen the document or who were sent copies, and (iv) state the ground(s) upon which each such document is considered privileged or protected.
7. Due to the current COVID-19 situation and most people working remotely, please deliver all responses to the following interrogatories and requests for production of documents **electronically** to:

Robert Guild  
[bguild@mindspring.com](mailto:bguild@mindspring.com)

Dorothy E. Jaffe  
[dori.jaffe@sierraclub.org](mailto:dori.jaffe@sierraclub.org)

### **DEFINITIONS**

1. The “Company” is defined to include both the Dominion Energy South Carolina, Inc. and any consultants or other agents that assisted in the development or preparation of the plan for electric distribution grid transformation projects.
2. “Communications” shall mean all oral communications and all written communications, including all “documents,” as defined below.
3. “Describe” means to state in detail each and every basis for the position taken or the statement made in response to the request and includes identifying each and every statement or document relied on and provide a copy of all such identified documents.
4. “Document” is defined to include all materials, of any kind or description, in any medium, regardless of where or how maintained or accessed (such as in or through official work or personal files, accounts, or devices). Documents include, by way of illustration only, correspondences, papers (including working papers), electronic mail (including any attachments), telegrams, facsimiles, notes, sound or video recordings, voice mail, minutes, memoranda, inter- or intra-office communications, diaries, daily logs, records, reports, studies, estimates, surveys, written forecasts, analyses, contracts, licenses, agreements, charts, graphs, indexes, database or other electronic records, statistical records, data sheets, data processing cards, computer printouts, computer discs, videotapes, motion pictures, agendas, meeting invitations, websites, intranet pages, and other electronic communications,

any notes or drafts relating to any of the foregoing, and any other documents of any kind in your possession, custody or control or to which you have access or known to exist..

5. “Identify,” “identification,” as used with respect to a person means to state the person’s full name and present address and his present or last known employment position and business affiliation if a natural person, and corporate or other status and address if not a natural person. “Identify” or “identity” when used in reference to a document means to state the following as to each document:
  - a. Its nature and contents;
  - b. Its date;
  - c. The date it was executed if different from the date it bears;
  - d. The name, address and position of its author or signer;
  - e. The name, address and position of its addressee, if any;
  - f. Its present location and the name, present address and position of the person or persons having present custody; and
  - g. Whether it has been destroyed, and if so, with regard to such destruction; (i) the date of destruction; (ii) the reason for destruction; and (iii) the identity of the person who destroyed the document.
6. “Including” means “including but not limited to.”
7. “Person” includes any individual, sole proprietorship, partnership, corporation, association, trust, statutory trust, joint venture, or other entity.
8. “You” or “your” means Dominion Energy South Carolina and its agents, employees, representatives, attorneys, experts, investigators, insurers, consultants, or anyone acting on behalf of Dominion Energy South Carolina.

## **DATA REQUESTS**

**Request No. 4-1.** Please refer to the Direct Testimony of W. Keller Kissam, page 14 where he states "Total spending on additions in Power Generation for the review period was \$878 million." Please provide a summary, organized by electric generating unit, stating how the \$878 million was allocated amongst the Company's power generation plants/units and over what time period. Please also provide the environmental, non-environmental and total spending for each plant/unit.

**Request No. 4-2.** Please provide the past and future environmental capital costs for each of DESC's plants/units by year for 2010 through 2030. Please specify the particular pieces of equipment or other costs that make up this spending.

**Request No. 4-3.** If Wateree, Williams, and Cope were retired, what costs would DESC/ratepayers continue to pay in the years after their retirement, assuming for Williams and Wateree early retirement in 2028 and Cope retires in 2071.

**Request No. 4-4.** Please reference Exhibit 1, pages 7-8 where Mr. Gissendanner stated on October 16, 2020 at 9:06am: "For plants where Mr. Neely had only a 2021 projection he assumed the 2020 expenditures were the same as the 2021 projection. He used that value growing at 2.8% for years 2022 and beyond." Please list the units and plants for which 2020 capital expenses were assumed by Mr. Neely to be identical to 2021 capital expenses.


**Request No. 4-5.** Reference DESC response to Sierra Club 1-28, attachment "DESC2M\_0CO\_BG (CONFIDENTIAL).xlsm", the "Capital" tab: Please confirm that the plants with capital costs highlighted in green (Cope, Williams, Urquhart CC, Wateree, Jasper, and CEC) do not have the same capital expenses reported in 2020 as in 2021.

**Request No. 4-6.** Please reference Exhibit 1, pages 13-14 where Mr. Gissendanner stated on October 20, 2020 at 5:53pm: "This morning I provided you a spreadsheet containing the budget for years 2021 – 2025 as of July 17, 2020. In other words, this spreadsheet contains the budget as it existed on July 17, 2020, including any modifications to the budget that had been made prior to that date. This information provides the support you requested for the years 2021-2025 in CONFIDENTIAL IRP Capital Forecast - 7-17-2020.xls. As I indicated in my prior email, the Company no longer has the budget numbers for 2020 as they existed on that date. Because the Company no longer has the information for the 2020 budget as it existed on July 17, 2020, that information was not provided. The Company cannot provide what it no longer has."

- a. Please confirm that DESC misplaced or discarded the source of the capital expenses used in its IRP modeling for plants Cope, Williams, Urquhart CC, Wateree, Jasper, and CEC.
- b. In the absence of any source for the 2020 capital expenses used in IRP modeling, please provide a written justification for the values used.

**Request No. 4-7.** Please reference DESC response to Sierra Club 1-11(l)-(o) and 2-8(l)-(o), DESC states, "The Company does not track revenue on a plant-by-plant basis." In the absence of this data on a plant-by-plant basis, please provide historical system-wide revenue on a \$ per MWh for the past 10 years.

Respectfully submitted this 22<sup>nd</sup> day of October, 2020.

  
 on behalf of  
 Robert Guild  
 S.C. Bar No. 0002358  
 314 Pall Mall Street  
 Columbia, SC 29201  
 (803) 917-5738  
 bguild@mindspring.com

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2020-125-E**

In re:

Application of Dominion Energy South  
Carolina, Incorporated for Adjustment  
of Rates and Charges (See Commission  
Order No.2020-313)

**CERTIFICATE OF SERVICE**

I hereby certify that I have served the persons listed on the official service list for Docket  
No. 2020-125-E, listed below, a copy of the Sierra Club's Fourth Set of Data Requests via  
electronic mail on this day, October 22, 2020.

Adam Protheroe, adam@scjustice.org

Alexander G. Shissias,  
alex@shissiaslawfirm.com

Andrew M. Bateman, abateman@ors.sc.gov

Alexander W. Knowles, aknowles@ors.sc.gov

Christopher M. Huber, chuber@ors.sc.gov

Carri Grube Lybarker,  
clybarker@scconsumer.gov

Derrick Price Williamson,  
dwilliamson@spilmanlaw.com

John B. Coffman, john@johncoffman.net

Roger P. Hall, rhall@scconsumer.gov

Steven W. Hamm, [sham@ors.sc.gov](mailto:sham@ors.sc.gov)

Scott Elliot, [selliot@elliottlaw.us](mailto:selliot@elliottlaw.us)  
Stephanie Easton, seaton@spilmanlaw.com

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Michael Anzelmo,  
manzelmo@mcguirewoods.com

Mitchell Willoughby,  
mwilloughby@willoughbyhoefer.com

K. Chad Burgess,  
Kenneth.burgess@dominionenergy.com

Matthew W. Gissendanner,  
matthew.gissendanner@dominionenergy.co



On behalf of  
Robert Guild



## **Exhibit 1**



Dori Jaffe &lt;dori.jaffe@sierraclub.org&gt;

**DESC Rate Case - Discovery Matter**

12 messages

**KENNETH BURGESS** <chad.burgess@dominionenergy.com>

Mon, Oct 12, 2020 at 9:38 AM

To: "bguild@mindspring.com" &lt;bguild@mindspring.com&gt;, "dori.jaffe@sierraclub.org" &lt;dori.jaffe@sierraclub.org&gt;

Cc: MATTHEW GISSENDANNER &lt;matthew.gissendanner@dominionenergy.com&gt;

Dear Bob and Dori –

Good morning. I'm writing to make you aware of a discovery matter that DESC needs to address. As you know, the Sierra Club has requested that DESC produce to it all documents that it has produced to ORS. In furtherance of this request, DESC provided to you its response to ORS Request No. 2-45. This response called for the production of charges that were incurred at Dominion Energy Services and then allocated to DESC. After providing this information to you and ORS, I have been made aware that certain information in that response requires redacting because it is sensitive information. We have removed DESC's response to ORS Request No. 2-45 from the Sierra Club SharePoint site and will be replacing that response with an amended response by redacting the sensitive information. I'll send you a follow-up email letting you know when DESC's amended response to ORS Request No. 2-45 has been uploaded the Sierra Club SharePoint site.

If you have any questions or concerns, please do not hesitate to contact me.

Chad

**K. Chad Burgess, Esquire**

Director &amp; Deputy General Counsel

400 Otarre Parkway, Cayce, SC 29033

Mailing Address: [220 Operation Way](#), MC C222, Cayce, SC 29033

O: 803-217-8141 M: 803-807-1559



CONFIDENTIALITY NOTICE: This electronic message contains information which may be legally confidential and or privileged and does not in any case represent a firm ENERGY COMMODITY bid or offer relating thereto which binds the sender without an additional express written confirmation to that effect. The information is intended solely for the individual or entity named above and access by anyone else is unauthorized. If you are not the intended recipient, any disclosure, copying, distribution, or use of the contents of this information is prohibited and may be unlawful. If you have received this electronic transmission in error, please reply immediately to the sender that you have received the message in error, and delete it. Thank you.

**Dori Jaffe** <dori.jaffe@sierraclub.org>

Tue, Oct 13, 2020 at 10:21 AM

To: KENNETH BURGESS <chad.burgess@dominionenergy.com>

Cc: "bguild@mindspring.com" <bguild@mindspring.com>, MATTHEW GISSENDANNER <matthew.gissendanner@dominionenergy.com>

Good Morning,

It now looks like we have our own discovery question/follow-up.

In the Excel files that you provided to us in Sierra Club 1-28, in Attachment "DESC2M\_0CO\_BG (CONFIDENTIAL).xlsm" in Row 18, Columns C through BJ of the Summary Tab, my expert sees a reference to an external workbook called: "G:\@\_CorpRec\JWN\Documents\MSOffice Data\EXCEL\IRP\2020\[DSM Costs (012720).xlsx]Scenarios!"

When I click on those boxes, I see a reference to an external workbook called: "C:\@\_CorpRec\JWN\Documents\MS Office Data\EXCEL\IRP\2020\[DSM Costs (012720).xlsx]Scenarios!"

I don't know if there is a difference between the C:\ and the G:\ so I wanted to alert you to that also. I have not checked all 144 spreadsheets in the Sierra Club 1-28 Confidential folder, but the ones I did check, all had the same reference to the same external Excel file in the Summary Tab.

Can you please provide access to that file?

Thank you

dori



**Dori Jaffe**

*pronouns: she/her*

Senior Attorney

50 F Street, NW, Eighth Floor

Washington, DC 20001

202-675-6275 (direct)

202-547-6009 (fax)

[dori.jaffe@sierraclub.org](mailto:dori.jaffe@sierraclub.org)

On Mon, Oct 12, 2020 at 2:28 PM KENNETH BURGESS <[chad.burgess@dominionenergy.com](mailto:chad.burgess@dominionenergy.com)> wrote:

Thank you Dori.

Chad

**From:** Dori Jaffe <[dori.jaffe@sierraclub.org](mailto:dori.jaffe@sierraclub.org)>

**Sent:** Monday, October 12, 2020 12:29 PM

**To:** CHAD BURGESS (Services - 6) <[chad.burgess@dominionenergy.com](mailto:chad.burgess@dominionenergy.com)>

**Cc:** Robert Guild <[bguild@mindspring.com](mailto:bguild@mindspring.com)>; MATTHEW GISSENDANNER (Services - 6) <[matthew.gissendanner@dominionenergy.com](mailto:matthew.gissendanner@dominionenergy.com)>

**Subject:** [EXTERNAL] Re: DESC Rate Case - Discovery Matter

\*\*\*This is an EXTERNAL email that was NOT sent from Dominion Energy. Are you expecting this message? Are you expecting a link or attachment? DO NOT click links or open attachments until you verify them\*\*\*

Thank you for letting us know. I have deleted our downloaded version of ORS 2-45.

dori



**Dori Jaffe**

*pronouns: she/her*

Senior Attorney

50 F Street, NW, Eighth Floor

Washington, DC 20001

202-675-6275 (direct)

202-547-6009 (fax)

[dori.jaffe@sierraclub.org](mailto:dori.jaffe@sierraclub.org)

[Quoted text hidden]

[Quoted text hidden]

**MATTHEW GISSENDANNER** <[matthew.gissendanner@dominionenergy.com](mailto:matthew.gissendanner@dominionenergy.com)>

Tue, Oct 13, 2020 at 11:52 AM

To: "dori.jaffe@sierraclub.org" <[dori.jaffe@sierraclub.org](mailto:dori.jaffe@sierraclub.org)>

Cc: "bguild@mindspring.com" <[bguild@mindspring.com](mailto:bguild@mindspring.com)>, KAREN SCRUGGS <[karen.scruggs@dominionenergy.com](mailto:karen.scruggs@dominionenergy.com)>, KENNETH BURGESS <[chad.burgess@dominionenergy.com](mailto:chad.burgess@dominionenergy.com)>

Dori:

I just uploaded the excel file "DSM Costs (012720)" to the 1-28 folder on the Sharepoint site. Please let me know if you have trouble accessing it.

Matt

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**Sent:** Tuesday, October 13, 2020 10:21 AM

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**Dori Jaffe**

*pronouns: she/her*

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On Mon, Oct 12, 2020 at 9:38 AM KENNETH BURGESS <[chad.burgess@dominionenergy.com](mailto:chad.burgess@dominionenergy.com)> wrote:

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[Quoted text hidden]

**Dori Jaffe** <dori.jaffe@sierraclub.org>

Thu, Oct 15, 2020 at 10:42 AM

To: MATTHEW GISSENDANNER <matthew.gissendanner@dominionenergy.com>

Cc: "bguild@mindspring.com" <bguild@mindspring.com>, KAREN SCRUGGS <karen.scruggs@dominionenergy.com>, KENNETH BURGESS <chad.burgess@dominionenergy.com>

Thank you for the update on ORS 2-45.

I do have another discovery issue regarding the Response to Sierra Club 1-28. Under the "Capital" tab (of any of the 140 spreadsheets) you'll see columns called "2020 Budget", "2021 Budget" and "Estimate" (which goes out to 2059) representing capital expenditures (and estimated expenditures) by Plant.

Where can we find the documents/data to support the capital forecasts that were inputted into columns F through K (2020 through 2025)?

thank you  
dori



**Dori Jaffe**  
*pronouns: she/her*  
Senior Attorney  
50 F Street, NW, Eighth Floor  
Washington, DC 20001  
202-675-6275 (direct)  
202-547-6009 (fax)  
[dori.jaffe@sierraclub.org](mailto:dori.jaffe@sierraclub.org)

On Tue, Oct 13, 2020 at 1:04 PM Dori Jaffe <[dori.jaffe@sierraclub.org](mailto:dori.jaffe@sierraclub.org)> wrote:

Received. Thank you so much for your quick response (while we are also online for the IRP hearing)!  
dori



**Dori Jaffe**  
*pronouns: she/her*  
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Cc: "bguild@mindspring.com" <[bguild@mindspring.com](mailto:bguild@mindspring.com)>, KAREN SCRUGGS <[karen.scruggs@dominionenergy.com](mailto:karen.scruggs@dominionenergy.com)>, KENNETH BURGESS <[chad.burgess@dominionenergy.com](mailto:chad.burgess@dominionenergy.com)>

Dori:

I have uploaded two confidential files to the 1-28 folder on the Sharepoint site:

CONFIDENTIAL IRP Capital Forecast - 7-17-2020.xls

CONFIDENTIAL RE\_ URGENT - IRP Modifications - Capital forecast.pdf

In the pdf, the first column of numbers are the cost center and the second column of numbers is the 2021 budget. I asked and was informed that there is no significance to certain numbers being in red font.

Below is an explanation of how this information was used:

For plants where Mr. Neely had only a 2021 projection he assumed the 2020 expenditures were the same as the 2021 projection. He used that value growing at 2.8% for years 2022 and beyond.



For plants where Mr. Neely had 2020-2025 projections, he averaged the 2021-2025 values and used this value as the annual projection of expenditures in years 2026 and beyond growing at 2.8%.

**From:** Dori Jaffe <dori.jaffe@sierraclub.org>  
**Sent:** Thursday, October 15, 2020 10:43 AM  
**To:** MATTHEW GISSENDANNER (Services - 6) <matthew.gissendanner@dominionenergy.com>  
**Cc:** Robert Guild <bguild@mindspring.com>; KAREN SCRUGGS (Services - 6) <karen.scruggs@dominionenergy.com>; CHAD BURGESS (Services - 6) <chad.burgess@dominionenergy.com>  
**Subject:** [EXTERNAL] Re: Re: Re: DESC Rate Case - Discovery Matter

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Received. Thank you so much for your quick response (while we are also online for the IRP hearing)!

dori

**Dori Jaffe**

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Senior Attorney

50 F Street, NW, Eighth Floor

Washington, DC 20001

202-675-6275 (direct)

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[dori.jaffe@sierraclub.org](mailto:dori.jaffe@sierraclub.org)

[Quoted text hidden]

[Quoted text hidden]

**Dori Jaffe** <dori.jaffe@sierraclub.org>

Fri, Oct 16, 2020 at 9:18 AM

To: MATTHEW GISSENDANNER <matthew.gissendanner@dominionenergy.com>

Cc: "bguild@mindspring.com" <bguild@mindspring.com>, KAREN SCRUGGS <karen.scruggs@dominionenergy.com>, KENNETH BURGESS <chad.burgess@dominionenergy.com>

Thank you very much for your quick response and the clarifying documents.

have a nice weekend

dori



**Dori Jaffe**

*pronouns: she/her*

Senior Attorney

50 F Street, NW, Eighth Floor

Washington, DC 20001

202-675-6275 (direct)

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[dori.jaffe@sierraclub.org](mailto:dori.jaffe@sierraclub.org)

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**Dori Jaffe** <dori.jaffe@sierraclub.org>

Fri, Oct 16, 2020 at 1:28 PM

To: MATTHEW GISSENDANNER <matthew.gissendanner@dominionenergy.com>

Cc: "bguild@mindspring.com" <bguild@mindspring.com>, KAREN SCRUGGS <karen.scruggs@dominionenergy.com>, KENNETH BURGESS <chad.burgess@dominionenergy.com>

After reviewing those two additional spreadsheets, we are still missing the data/documentation that supports where the capital projections for 2020-2025 came from. More specifically, using the clarifying information you provided about Mr. Neely:

For plants where Mr. Neely had only a 2021 projection he assumed the 2020 expenditures were the same as the 2021 projection. He used that value growing at 2.8% for years 2022 and beyond. **If I understand correctly, the 2020 expenditures were considered the same as the 2021 projections. How were the 2020 expenditures derived? We are looking for the breakdown/underlying data for where the 2020 expenditure number came from.**

For plants where Mr. Neely had 2020-2025 projections, he averaged the 2021-2025 values and used this value as the annual projection of expenditures in years 2026 and beyond growing at 2.8%. **We were looking for the breakdown/underlying data for where the actual projections he had for 2020-2025 came from. It appears those numbers were typed directly into the spreadsheet with no indication of how they were derived.**

We appreciate your patience as we try to understand the numbers.

Thank you,

dori

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**MATTHEW GISSENDANNER** <matthew.gissendanner@dominionenergy.com>

Tue, Oct 20, 2020 at 7:56 AM

To: "dori.jaffe@sierraclub.org" <dori.jaffe@sierraclub.org>

Cc: "bguild@mindspring.com" <bguild@mindspring.com>, KAREN SCRUGGS <karen.scruggs@dominionenergy.com>, KENNETH BURGESS <chad.burgess@dominionenergy.com>

Dori:

I have uploaded "CONFIDENTIAL 2021 – 2025 Budget.xlsx" to Folder 1-28. This confidential file contains the budget as of July 17, 2020; it does not include any budget updates that may have occurred after July 17, 2020.

The Company derived its 2020 expenditures based on its projected spending for the year at the time the spreadsheets previously provided were produced. The Company's projection for 2020 is regularly updated, and the Company does not have a copy of the spreadsheet as it existed at the time the previously provided spreadsheets were created.

Matt

---

**From:** Dori Jaffe <dori.jaffe@sierraclub.org>

**Sent:** Friday, October 16, 2020 1:28 PM

**To:** MATTHEW GISSENDANNER (Services - 6) <matthew.gissendanner@dominionenergy.com>

**Cc:** Robert Guild <bguild@mindspring.com>; KAREN SCRUGGS (Services - 6) <karen.scruggs@dominionenergy.com>; CHAD BURGESS (Services - 6) <chad.burgess@dominionenergy.com>

**Subject:** [EXTERNAL] Re: Re: Re: Re: DESC Rate Case - Discovery Matter

\*\*\*This is an EXTERNAL email that was NOT sent from Dominion Energy. Are you expecting this message? Are you expecting a link or attachment? DO NOT click links or open attachments until you verify them\*\*\*

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We appreciate your patience as we try to understand the numbers.

Thank you,

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On Fri, Oct 16, 2020 at 9:18 AM Dori Jaffe <[dori.jaffe@sierraclub.org](mailto:dori.jaffe@sierraclub.org)> wrote:

Thank you very much for your quick response and the clarifying documents.

have a nice weekend

dori

**Dori Jaffe**

*pronouns: she/her*

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Washington, DC 20001

202-675-6275 (direct)

202-547-6009 (fax)

[dori.jaffe@sierraclub.org](mailto:dori.jaffe@sierraclub.org)

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**Dori Jaffe** <dori.jaffe@sierraclub.org>

Tue, Oct 20, 2020 at 8:57 AM

To: MATTHEW GISSENDANNER <matthew.gissendanner@dominionenergy.com>

Cc: "bguild@mindspring.com" <bguild@mindspring.com>, KAREN SCRUGGS <karen.scruggs@dominionenergy.com>, KENNETH BURGESS <chad.burgess@dominionenergy.com>

Thank you. We will let you know if we have any additional questions.  
dori



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202-675-6275 (direct)

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[Quoted text hidden]

**Dori Jaffe** <dori.jaffe@sierraclub.org>

Tue, Oct 20, 2020 at 1:23 PM

To: MATTHEW GISSENDANNER <matthew.gissendanner@dominionenergy.com>

Cc: "bguild@mindspring.com" <bguild@mindspring.com>, KAREN SCRUGGS <karen.scruggs@dominionenergy.com>, KENNETH BURGESS <chad.burgess@dominionenergy.com>

Matt,

I understand from your message that the Company doesn't have the 2020 projections as it existed when you responded to our prior discovery request (or when you were putting together your rate case application), but the spreadsheet you shared doesn't have any projections for 2020. You stated that this spreadsheet doesn't include budget updates occurring after July 17, 2020, but what about before? I don't see a 2020 column.

In your email on 10/16 you said: "For plants where Mr. Neely had only a 2021 projection he assumed the 2020 expenditures were the same as the 2021 projection. He used that value growing at 2.8% for years 2022 and beyond." Can you please confirm if this sentence means that the 2021 column in the spreadsheet you sent to me this morning is the same for 2020? Or are there different capital expenditures for 2020?

Thank you in advance for the clarification on the 2020 capital expenditures.

dori

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**MATTHEW GISSENDANNER** <matthew.gissendanner@dominionenergy.com>

Tue, Oct 20, 2020 at 5:53 PM

To: "dori.jaffe@sierraclub.org" <dori.jaffe@sierraclub.org>

Cc: "bguild@mindspring.com" <bguild@mindspring.com>, KAREN SCRUGGS <karen.scruggs@dominionenergy.com>, KENNETH BURGESS <chad.burgess@dominionenergy.com>

Dori:

Mr. Neely relied on the information provided in "CONFIDENTIAL IRP Capital Forecast - 7-17-2020.xls" and "CONFIDENTIAL RE\_ URGENT - IRP Modifications - Capital forecast.pdf," which I provided you on October 16.

This morning I provided you a spreadsheet containing the budget for years 2021 – 2025 as of July 17, 2020. In other words, this spreadsheet contains the budget as it existed on July 17, 2020, including any modifications to the budget that had been made prior to that date. This information provides the support you requested for the years 2021-2025 in CONFIDENTIAL IRP Capital Forecast - 7-17-2020.xls." As I indicated in my prior email, the Company no longer has the budget numbers for 2020 as they existed on that date. Because the Company no longer has the information for the 2020 budget as it existed on July 17, 2020, that information was not provided. The Company cannot provide what it no longer has.

With regard to your second question, for any plants not included in "CONFIDENTIAL IRP Capital Forecast - 7-17-2020.xls," Mr. Neely used the information provided in "CONFIDENTIAL RE\_ URGENT - IRP Modifications - Capital forecast.pdf." I have uploaded "CONFIDENTIAL – 2021 Budget – Peaking Hydro Units.xlsx" to the 1-28 folder which provides the 2021 budget information for those units. For these plants, Mr. Neely assumed that the 2020 expenditures were the same as the 2021 projection. This sentence--and the sentence in my prior email--does not indicate that either the actual 2020 budget or the actual 2020 expenditures for these plants are the same as the 2021 budget for these plants; it only speaks to Mr. Neely's assumption since he was not provided with the 2020 budget for those plants.

With the provision of this latest spreadsheet, the Company has provided the support that it has for the spreadsheets previously provided on October 16. If further information is requested, you may submit a formal data request.

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**Dori Jaffe** <dori.jaffe@sierraclub.org>

Wed, Oct 21, 2020 at 7:56 AM

To: MATTHEW GISSENDANNER <matthew.gissendanner@dominionenergy.com>

Cc: "bguild@mindspring.com" <bguild@mindspring.com>, KAREN SCRUGGS <karen.scruggs@dominionenergy.com>, KENNETH BURGESS <chad.burgess@dominionenergy.com>

Thank you. We do appreciate your willingness to engage in clarifying, informal requests. If we have any additional questions we will submit it in a formal request.

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